

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

<p>SMARTMATIC USA CORP., SMARTMATIC INTERNATIONAL HOLDING B.V., and SGO CORPORATION LIMITED,</p> <p style="text-align: center;">Plaintiffs, v. MICHAEL J. LINDELL and MY PILLOW, INC.,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No. 22-cv-0098-WMW-JFD</p>
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**DECLARATION OF MICHAEL E. BLOOM IN SUPPORT OF SMARTMATIC'S
OPPOSITION TO DEFENDANTS' SECOND MOTION TO COMPEL**

I, Michael E. Bloom, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over the age of 18, I am competent to make this declaration, and I have personal knowledge of the facts stated herein. These facts are true to the best of my knowledge, information, and belief, and if called upon to testify as a witness, I could and would testify competently to them.

2. I am a partner at the law firm Benesch, Friedlander, Coplan & Aronoff, LLP, and I represent Plaintiffs Smartmatic USA Corp., Smartmatic International Holding B.V., and SGO Corporation Limited ("Smartmatic") in the above-captioned lawsuit.

3. Attached as Exhibit A is a true and correct copy of Smartmatic's Complaint in *Smartmatic USA Corp. v. Fox Corp.*, No. 151136/2021 (N.Y. Sup. Ct.).

4. Attached as Exhibit B is a true and correct copy of Smartmatic's Complaint in *Smartmatic USA Corp. v. Herring Networks, Inc.*, No. 1:21-cv-02900 (D.D.C.).

5. Attached as Exhibit C is a true and correct copy of Smartmatic's Complaint in *Smartmatic USA Corp. v. Newsmax Media, Inc.*, No. N21C-11-028 (Del. Super.).

6. Attached as Exhibit D is a true and correct copy of Smartmatic's Complaint in *Smartmatic USA Corp. v. Powell*, No. 21-cv-02995 (D.D.C.).

7. Attached as Exhibit E is a true and correct copy of a January 9, 2023 letter from Matthew Eslick to Michael Bloom.

8. Attached as Exhibit F is a true and correct copy of Smartmatic's Supplemental Answers and Objections to Defendants' First Set of Interrogatories.

9. Attached as Exhibit G is a true and correct copy of Smartmatic's Second Supplemental Answers and Objections to Defendants' First Set of Interrogatories.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.



Michael E. Bloom

Executed on July 18, 2023.